



pnc

To:  
Crissy Powell : cpowell@kmallawgroup.com  
William C. Miller -215-627-1377 FAX: 215-627-6299  
Stanley Luongo

Case # 16-14690MDC Loan# ending 4139

United States Bankruptcy Court  
Robert N.C. Nix Bldg.  
900 Market Street , Suite 400  
PhL, Pa. 19107-4299

KML Law Group  
Suite500 BYN Mellon Independence Ctr  
701 Market Street  
PHL, Pa, 19106-1532

I am Timothy Lewis. 11/25/17 I have paid at the PNC branch the total requested. Attached are the receipts. My spouse has passed away and my home will be going on the market soon for sale. I have been under a lot of pressure with the health insurance bills since I was laid off and no coverage for some time and funeral/burial costs. I have no assistance monetarily. I am 60 years old and wish to receive a phone call since I have disabilities. I mailed Mr Miller the D.C. for Anna but no response. I am sending this communication to all parties. I need to make you aware that since my wife's passing and my mental capabilities slowing down , I need assistance when dealing with the mail like I received from PNC . It appears to be way complexed nevertheless the \$2085.70 has been paid. I am currently trying to renovate the house for sale myself since I cannot afford contractors. I need contact from Mr . Miller & Mr Luongo as soon as possible going forward. Stan - need to know what the balance of the bankruptcy term is and what \$\$\$ it require to resolve. pls.  
Please advise

Tim Lewis  
604 Glencroft Circle  
Folcroft Pa. 19032  
484-494-1910





020  
INTERBORO (189)  
501 CHESTER PIKE  
PROSPECT PARK, PA, 19076  
Cashbox 09

Business Date NOV 27, 2017  
Calendar Date NOV 25, 2017

Payment 11:10  
Transaction Number 00066  
Account Type Mortgage/HEIL/HELOC  
Account Number XXXXXX4139  
Transaction Amount \$ 2,085.70  
Check Amount \$ 2,085.70

This deposit or payment is accepted subject to verification and to the rules and regulations of this bank. Deposits may not be available for immediate withdrawal. Receipt should be held until verified with your statement.

FOR MORE INFORMATION AND EXAMPLES OF WHEN DEPOSITS BECOME AVAILABLE, GO TO [WWW.PNC.COM/BANKWISELY](http://WWW.PNC.COM/BANKWISELY)



Saju Zakariah  
Teller Banking Representative  
T 610-522-4242 F 610-522-4248  
saju.zakariah@pnc.com

Member of The PNC Financial Services Group  
501 Chester Pike  
Prospect Park Pennsylvania 19076

CUSTOMER COPY

61111144-1

52-0132  
112

DATE: 11/25/2017

61111144-1

52,085.70

OFFICIAL CHECK

TD Bank

RE: TIMOTHY LEWIS

PAY TO THE PNC MORTGAGE ORDER OF

Two Thousand Eighty Five AND 70/100

DRAWER: TD BANK, N.A.

Security Features: Draw on Back

NON NEGOTIABLE

AUTHORIZED SIGNATURE

The Bank will not stop payment on this Official Bank Check and reimburse the purchaser or issue a replacement until the purchaser or payee signs a Declaration of Loss and more than 90 days have passed since the date of issue.



**KML LAW GROUP, P.C.**  
**Suite 5000 – BNY Mellon Independence Center**  
**701 Market Street**  
**Philadelphia, PA 19106-1532**  
**www.kmllawgroup.com**

November 17, 2017

Timothy F. Lewis, Sr.  
604 Glencroft Circle  
Folcroft, PA 19032

Anna Marie Lewis  
604 Glencroft Circle  
Folcroft, PA 19032

RE: Timothy F. Lewis, Sr. and Anna Marie Lewis  
Case No. 16-14690 MDC  
Last 4 Digits of Loan #: 4139

Dear Sir or Madam:

Enclosed is a true and correct copy of Movant's Motion for Relief From the Automatic Stay Under Section 362, the original of which was filed with the Bankruptcy Court.

Also enclosed is a Notice of Motion, Response Deadline and Hearing Date indicating the date within which an Answer must be filed and place, time and date of the hearing on the Motion. Please note the hearing date of December 14, 2017.

Very truly yours,

KML Law Group, P.C.

By: /s/ Crissy Powell  
Crissy Powell, Legal Assistant  
for KML Law Group, P.C.  
(215) 825-6313 (Direct)  
Fax (215) 825-6413  
email: cpowell@kmllawgroup.com

Enclosure

cc: Stanley E. Luongo, Jr.  
William C. Miller, Esq.  
Pnc Mortgage, A Division Of Pnc Bank, National Association  
Office of U.S. Trustee





William C. Miller, Esq.

Trustee

11 U.S.C. Section 362

**MOTION OF PNC BANK, NATIONAL ASSOCIATION  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362**

1. Movant is PNC Bank, National Association.
2. Debtors are the owners of the premises 604 Glencroft Circle, Folcroft, PA 19032, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage in the original principal amount of \$77,900.00 on the mortgaged premises that was executed on November 28, 2014. Said mortgage was recorded on December 8, 2014 at Book 05578, Page 0474 in Delaware County.
4. William C. Miller, Esq. is the Trustee appointed by the Court.
5. The commencement or continuation of mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments was stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtors.
6. Debtors have failed to make the post-petition mortgage payments due in the amount of \$969.70 per month for the months of September 2017 through November 2017, less a suspense balance of \$823.40.
7. The total amount necessary to cure the post-petition delinquency on the mortgage loan and to reinstate the loan post-petition is \$2,085.70.
8. Movant is entitled to relief from stay for cause.



**NOTICE OF MOTION, RESPONSE DEADLINE**  
**ND HEARING DATE**

PNC Bank, National Association has filed a Motion for Relief from Stay with the court for relief from the automatic stay of Section 362 of the Bankruptcy Code.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion, then on or before December 1, 2017 you or your attorney must do all of the following:

- (a) file an answer explaining your position at:  
United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to movant's attorneys:  
Matteo S. Weiner, Esquire  
Thomas Puleo, Esquire  
KML Law Group, P.C.  
Suite 5000 – BNY Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman, the United States Bankruptcy Judge, in Courtroom No. 2 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, 2nd Floor, Philadelphia, PA 19107-4299 on December 14, 2017, at 11:00 a.m. , or as soon thereafter as counsel can be heard.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

